

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :

v. :

JANIA ACEITUNO,
DONTE LUCAS,

Defendants. :

No. 1:24-CR- 00175

(Judge WILSON)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

18 U.S.C. § 1349

(Wire Fraud Conspiracy)

FILED
HARRISBURG, PA

JUL 10 2024

PER **IBR**
DEPUTY CLERK

1. From in or around October 2021 through in or around June 2022, in Lebanon County, Pennsylvania, within the Middle District of Pennsylvania, and elsewhere, the defendants,

**JANIA ACEITUNO and
DONTE LUCAS,**

knowingly, intentionally and unlawfully combined, conspired, confederated and agreed with each other and persons known and unknown to the grand jury to knowingly devise, and intend to devise, a scheme and artifice to defraud pharmacies located within the Middle District of Pennsyl-

vania and elsewhere, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing the scheme and artifice to defraud, transmitted and caused to be transmitted by means of wire communication in interstate commerce writings, signs, signals, pictures and sounds, in violation of Title 18, United States Code, Section 1343.

Manner and Means

The conspiracy was accomplished, in part, by the following manner and means:

2. JANIA ACEITUNO and DONTE LUCAS and their coconspirators obtained and caused others to obtain stolen identities and the personal information of healthcare providers, including physicians and certified registered nurse practitioners, through use of the internet and interstate wires. That information included healthcare provider registration numbers issued by the Drug Enforcement Administration (DEA), which enable healthcare providers to order prescription medications and controlled substances from pharmacies.

3. JANIA ACEITUNO and DONTE LUCAS and their coconspirators used and caused others to use the stolen identities and personal information of healthcare providers, including their DEA registration numbers, to order prescriptions for medications and controlled substances from pharmacies located in the Middle District of Pennsylvania and elsewhere. The prescriptions were ordered through use of the internet and interstate wires on behalf of fabricated patient names. The fraudulent prescriptions included Promethazine with Codeine, a Schedule V controlled substance.

4. JANIA ACEITUNO and DONTE LUCAS and their coconspirators obtained and caused couriers to obtain the fraudulent prescriptions from pharmacies, through use of false identifications, by impersonating healthcare providers, and by misrepresenting their relationships to the fabricated patients.

5. JANIA ACEITUNO and DONTE LUCAS and their coconspirators distributed and caused others to distribute the prescription medications and controlled substances, in exchange for United States currency.

6. In furtherance of the scheme and artifice to defraud, JANIA ACEITUNO and DONTE LUCAS and their coconspirators communicated with one another through use of the internet and interstate wires.

7. In furtherance of the scheme and artifice to defraud, JANIA ACEITUNO and DONTE LUCAS and their coconspirators transferred electronic currency to one another through use of payment processor services over the internet and interstate wires.

All in violation of Title 18, United States Code, Section 1349.

THE GRAND JURY FURTHER CHARGES:

COUNTS 2–5

18 U.S.C. § 1028A

(Aggravated Identify Theft)

On or about the dates designated below for each count, in Lebanon County, Pennsylvania, within the Middle District of Pennsylvania, and elsewhere, the defendants,

**JANIA ACEITUNO and
DONTÉ LUCAS,**

aiding and abetting others and aided and abetted by others, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), namely wire fraud conspiracy, in violation of Title 18, United States Code, Section 1349, and wire fraud, in violation of Title 18, United States Code, Section 1343, knowing that the means of identification belonged to another actual person, to wit:

Count	Victim	Act
2	D.R. DEA No. XXXXXXXX72	Prescription called in to Flying Hills Pharmacy for fictional patient "Dimitri Cerko" on or about October 4, 2021.
3	M.P. DEA No. XXXXXXXX61	Prescription called in to Mike's Pharmacy for fictional patient "Elias DeChong" in or around October 2021.
4	H.H.K. DEA No. XXXXXXXX08	Prescription called in to Stauffer's Drug Store for fictional patient "Henry Lous" on or about October 21, 2021.
5	D.F. DEA No. XXXXXXXX51	Prescription called in to Gil-Co Faith Pharmacy for fictional patient "Darnell Goodson" on or about June 11, 2022.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

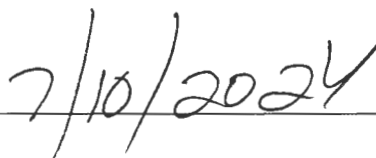
GERARD M. KARAM
United States Attorney


MICHAEL SCALERA
Assistant United States Attorney

A TRUE BILL



FOREPERSON


Date